

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 20cr10003
)	
v.)	Violation:
)	
DOMINICK BAILEY and)	<u>Count One</u> : Felon in Possession of
GLENN LACEDRA,)	Firearms and Ammunition; Aiding and
)	Abetting
)	(18 U.S.C. § 922(g)(1); 18 U.S.C. § 2)
Defendants)	
)	<u>Firearm Forfeiture Allegation</u>
)	(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Felon in Possession of Firearms and Ammunition; Aiding and Abetting
(18 U.S.C. § 922(g)(1); 18 U.S.C. § 2)

The Grand Jury charges:

On or about November 14, 2019, in Boston, in the District of Massachusetts, the defendants,

DOMINICK BAILEY and
GLENN LACEDRA,

each knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms and ammunition, that is, a Taurus PT92 pistol, bearing serial number TJL83823D; a Thompson Center Arms Encore pistol, bearing serial number 554731; a Palmetto Armory PA-15 rifle, bearing serial number LW034988; a Walther P22 pistol, bearing serial number L214315; one round of .223 caliber ammunition; and one round of .270 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1) and Section 2.

FIREARM FORFEITURE ALLEGATION
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1), set forth in Count One, the defendants,

DOMINICK BAILEY and
GLENN LACEDRA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. a Taurus PT92 pistol, bearing serial number TJL83823D;
- b. a Thompson Center Arms Encore pistol, bearing serial number 554731;
- c. a Palmetto Armory PA-15 rifle, bearing serial number LW034988;
- d. a Walther P22 pistol, bearing serial number L214315;
- e. one round of .223 caliber ammunition; and
- f. one round of .270 caliber ammunition.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL



FOREPERSON



JAMES E. ARNOLD
PHILIP C. CHENG
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

District of Massachusetts: January 8, 2020
Returned into the District Court by the Grand Jurors and filed.

